UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

UNITED STATES OF AMERICA, : CASE NO.: 3:10 CR-018

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PLAINTIFF, : JUDGE MICHAEL R. BARRETT

:

V .

:

CHARLES PAINTER,

:

DEFENDANT.

DEFENDANT'S REQUEST FOR EXTENSION OF PSIR DEADLINES TO FILE OBJECTIONS

Now comes the defendant, Charles Painter, by and through his counsel, Bradley Davis Barbin, and respectfully moves this Honorable Court to grant a thirty (30) day extension to the Presentence Investigation, Report and Disclosure schedule. A memorandum in support of said motion follows.

Respectfully submitted,

Bradley Davis Barbin (0070298)
Attorney for the Defendant
52 W. Whittier St.

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MEMORANDUM

Defense Counsel respectfully requests additional time to meet with the Defendant and government agent to assist counsel in the preparation of an offense version and financial records. This tax investigation involves a complex multi-year assessment of a multi-state professional employer organization [hereinafter PEO].

This request is in the interest of justice and will assist the U.S. Probation Officer Teresa Alford in the preparation of a thorough Presentence Investigation Report.

Respectful by submitted,

Bradley Davis Barbin (0070298)
Attorney for the Defendant

52 W. Whittier St. Columbus, OH 43206

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Certificate of Service

This will certify that a copy of the foregoing was served electronically to:

Dwight Keller, Assistant United States Attorney, 200 W Second Street, Suite 600, Dayton, OH 45402 and

Teresa Alford, United States Probation Officer, 100 E Fifth St., Cincinnati, OH 45202;
Terri L Alford@ohsp.uscourts.gov

on this 15^{th} day of March, 2010.

Respectfully submitted,

Bradley Davis Barbin (0070298)
Attorney for the Defendant
52 W. Whittier St.
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